

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Pro-Life Action Ministries, Lucy
Maloney, Thomas Wilkin, and Debra
Braun,

Case No. 23-CV-00853
(ECT/DJF)

Plaintiffs,

v.

City of Minneapolis, a Minnesota
municipality,

Defendant.

**Stipulated Motion to Extend
Plaintiffs' Deadline to File
Motion for Attorneys' Fees
and Costs**

Plaintiffs Pro-Life Action Ministries *et al.* and Defendant City of Minneapolis hereby stipulate to extend Plaintiffs' deadline to file their motion for attorneys' fees and costs by 14 days, to January 16, 2025, and respectfully ask the Court to enter an order extending these deadlines. In support of their motion, the parties show the Court as follows:

1. Judgment was entered for Plaintiffs in this case on December 19, 2024. (Dkt. 101). Plaintiffs' motion pursuant to Fed. R. Civ. Pr. 54(d) for attorneys' fees and costs (*see* dkt. 99-1) is currently due January 2, 2025.
2. Plaintiffs represent that, due to the unavailability of staff owing to the holidays, they require additional time to collect the necessary materials to prepare their motion. In addition, due to the

extension requested by Plaintiffs and previously scheduled travel of counsel, Defendant's counsel will require additional time to respond to Plaintiffs' motion for attorneys' fees and costs.

3. The parties have agreed that with the Court's permission, Plaintiffs will submit their motion for attorneys' fees and costs on January 16, 2025, and Defendant will file its response on February 13, 2025.
4. The Court previously set this matter for settlement conference, to be held on March 3, 2025. After judgment was entered, the parties asked the Court to retain that date, in case they need the Court's assistance to settle the outstanding matter of fees and costs. The parties remain open to a negotiated resolution to the matter of fees and costs, which the additional time will allow them to pursue.

WHEREFORE, Plaintiffs and Defendants jointly move the Court to extend the deadline for Plaintiffs to file their motion for attorneys' fees and costs by 14 days, to January 16, 2025, and to extend the deadline for Defendant to respond to February 13, 2025.

Respectfully submitted, this 27th day of December, 2024.

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